UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION

UNITED STATES OF AMERICA

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CASE NO. 8: 22 CH 55 KIEM - TEW

N.D. OF ALABAMA

BERNARDINO RODRIGUEZ-BERRERA a/k/a "Chiquita" and BELINDA ARAGONEZ-PIEDRAS 18 U.S.C. § 1956(h) 18 U.S.C. § 1956(a)(3)(B)

INDICTMENT

The Grand Jury charges:

COUNT ONE (Money Laundering Conspiracy)

A. Introduction

At times material to this Indictment:

- 1. Bernardino Rodriguez-Barrera, a/k/a Chiquita, was a citizen of Mexico and a resident of Arizona. Rodriguez-Barrera owned and operated Bel-Ber Entertainment, Inc., a music promotion business.
- 2. Belinda Aragonez Piedras was a citizen of Mexico and a resident of Texas. Piedras partnered with Rodriguez-Barrera to operate Bel-Ber Entertainment, Inc.
- 3. Bel-Ber Entertainment, Inc., was an Arizona corporation formed in or around March 2018 by Bernardino Rodriguez-Barrera. Bel-Ber Entertainment, Inc.

maintained a bank account at Bank of America ending in -7606, the signatory for which was Bernardino Rodriguez-Barrera.

B. The Conspiracy

4. Beginning on an unknown date, but at least as early as in or around October 2017, and continuing through and including the date of this Indictment, in the Middle District of Florida and elsewhere, the defendants,

BERNARDINO RODRIGUEZ-BARRERA a/k/a "Chiquita" and BELINDA ARAGONEZ PIEDRAS,

did knowingly and willfully combine, conspire, confederate, and agree with each other and others, both known and unknown to the Grand Jury, to commit money laundering, in violation of 18 U.S.C. § 1956(a)(3)(B).

C. Manner and Means

- 5. The manner and means by which the defendants sought to accomplish the purpose of the conspiracy included, among other things:
- a. It was a part of the conspiracy that conspirators would and did form and operate Bel-Ber Entertainment, Inc., a music promotion business.
- b. It was further part of the conspiracy that the conspirators would and did open, maintain, and control the Bel-Ber account at Bank of America ending in -7606.
- c. It was further part of the conspiracy that the conspirators would and did agree to receive and launder cash payments they believed were the proceeds

of narcotics trafficking in exchange for the conspirators keeping 10% of the laundered funds.

- d. It was further part of the conspiracy that the conspirators would and did receive cash payments, believing that the funds were the proceeds of illegal narcotics trafficking, so that the conspirators could conceal or disguise the nature, location, source, ownership, and control of property believed to be the proceeds.
- e. It was further part of the conspiracy that the conspirators would and did launder and clean the purported narcotics proceeds they received by, among other things, using them to fund their music promotion business and depositing the funds into one or more Bel-Ber Entertainment, Inc. bank accounts.
- f. It was further part of the conspiracy that the conspirators would and did return the laundered funds via cash deposits, counter checks, and internal transfers, among other ways, to a Bank of America account in the name of Tejas Industries ending in -7788, which was located in Tampa, Florida.
- g. It was further part of the conspiracy that the conspirators would and did keep and share in a portion of the purported narcotics proceeds for their own benefit in use, in excess of the agreed upon 10% fee.
- h. It was further part of the conspiracy that the conspirators and others would and did perform acts and make statements to hide and conceal and cause to be hidden and concealed the purpose of the conspiracy and the acts committed in furtherance thereof.

All in violation of 18 U.S.C. § 1956(h).

COUNTS TWO THROUGH FIVE (Money Laundering)

On or about the dates listed below, in the Middle District of Florida and elsewhere, the defendant,

BERNARDINO RODRIGUEZ-BARRERA a/k/a "Chiquita,"

with the intent to conceal or disguise the nature, location, source, ownership, and control of property believed to be the proceeds of specified unlawful activity, did knowingly conduct the financial transactions described below affecting interstate commerce involving property represented by a law enforcement officer to be proceeds of specified unlawful activity, that is conspiracy to distribute and possess with the intent to distribute narcotics, in violation of 21 U.S.C. § 846, and distribution and possession with intent to distribute narcotics, in violation of 21 U.S.C. § 841:

COUNT	DATE	TRANSACTION	AMOUNT	FINANCIAL INSTITUTION
TWO	2/16/2018	Delivery of cash to defendant in Texas	\$50,000	Withdrawn from Garda FBI account in St. Petersburg, Florida
THREE	4/24/2018	Transfer to Tejas Industries Bank of America account -7788 Tampa, Florida	\$15,000	Sent from Bel-Ber Entertainment, Inc. Bank of America account - 7606
FOUR	5/4/2018	Delivery of cash to defendant in Texas	\$40,000	Withdrawn from Garda FBI account in St. Petersburg, Florida

COUNT	DATE	TRANSACTION	AMOUNT	FINANCIAL INSTITUTION
FIVE	5/7/2018	Transfer to Tejas Industries Bank of America account -7788 Tampa, Florida	\$36,000	Sent from Bel-Ber Entertainment, Inc. Bank of America account - 7606

All in violation of 18 U.S.C. §§ 1956(a)(3)(B) and 2.

COUNTS SIX THROUGH FIFTEEN (Money Laundering)

On or about the dates listed below, in the Middle District of Florida and elsewhere, the defendants,

BERNARDINO RODRIGUEZ-BARRERA a/k/a "Chiquita" and BELINDA ARAGONEZ PIEDRAS,

with the intent to conceal or disguise the nature, location, source, ownership, and control of property believed to be the proceeds of specified unlawful activity, did knowingly conduct the financial transactions described below affecting interstate commerce involving property represented by a law enforcement officer to be proceeds of specified unlawful activity, that is conspiracy to distribute and possess with the intent to distribute narcotics, in violation of 21 U.S.C. § 846, and distribution and possession with intent to distribute narcotics, in violation of 21 U.S.C. § 841:

COUNT	DATE	TRANSACTION	AMOU NT	FINANCIAL INSTITUTION
SIX	6/5/2018	Delivery of cash to defendants in Texas	\$100,000	Withdrawn from Garda FBI account in St. Petersburg, Florida
SEVEN	7/5/2018	Counter Credit to Tejas Industries Bank of America account -7788 Tampa, Florida	\$25,000	Sent from Bank of America branch in Texas
EIGHT	7/5/2018	Counter Credit to Tejas Industries Bank of America account -7788 Tampa, Florida	\$20,000	Sent from Bank of America branch in Texas
NINE	7/30/3018	Transfer to Tejas Industries Bank of America account -7788 Tampa, Florida	\$8,000	Sent from Bel-Ber Entertainment, Inc. Bank of America account -7606
TEN	8/7/2018	Delivery of cash to defendants in Texas	\$60,000	Withdrawn from Garda FBI account in St. Petersburg, Florida
ELEVEN	8/20/2018	Transfer to Tejas Industries Bank of America account -7788 Tampa, Florida	\$25,000	Sent from Bel-Ber Entertainment, Inc. Bank of America account -7606
TWELVE	11/13/2018	Counter Credit to Tejas Industries Bank of America account -7788 Tampa, Florida	\$9,000	Sent from Bank of America branch in Texas - Cashier's Check, no. 1049608837

COUNT	DATE	TRANSACTION	AMOU NT	FINANCIAL INSTITUTION
THIRTEEN	11/13/2018	Counter Credit to Tejas Industries Bank of America account -7788 Tampa, Florida	\$9,000	Sent from Bank of America branch in Texas- Cashier's Check, no. 1049608838
FOURTEEN	11/13/2018	Counter Credit to Tejas Industries Bank of America account -7788 Tampa, Florida	\$9,000	Sent from Bank of America branch in Texas - Check, no. 1049608839
FIFTEEN	11/13/2018	Counter Credit to Tejas Industries Bank of America account -7788 Tampa, Florida	\$3,000	Sent from Bank of America branch in Texas - Cashier's Check, no. 1049608840

All in violation of 18 U.S.C. §§ 1956(a)(3)(B) and 2.

FORFEITURES

- 1. The allegations contained in Counts One through Fifteen are incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 982(a)(1).
 - 2. Upon conviction of a violation of 18 U.S.C. § 1956, the defendants,

BERNARDINO RODRIGUEZ-BARRERA a/k/a "Chiquita" and BELINDA ARAGONEZ PIEDRAS,

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offense, or any property traceable to such property.

- 3. The property to be forfeited includes, but is not limited to, a judgment equal to the amount of money involved in the offenses.
- 4. If any of the property described above, as a result of any act or omission of the defendant:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1).

A TRUE BILL,

Foreperson

ROGER B. HANDBERG United States Attorney

Fix: Amanda L. Riedel

By:

Assistant United States Attorney

Christopher F. Murray

Assistant United States Attorney

Chief, Criminal Division

GPO \$63 525 Violations: 18 U.S.C. § 1956(h) and 18 U.S.C. § 1956(a)(3)(B) Case 8:22-cr-00055-KKM-TGW Document 1 Filed 02/08/22 Page 9 of 9 PageID 9 BERNARDINO RODRIGUEZ-BARRERA THE UNITED STATES OF AMERICA UNITED STATES DISTRICT COURT BELINDA ARAGONEZ PIEDRAS Middle District of Florida Filed in open court this 8th day a/k/a "Chiquita" Tampa Division INDICTMENT Clek Foreperson Š of February 2022. A true bill, Bail \$ o N FORM OBD-34 February 22